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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

CALIFORNIA COALITION FOR WOMEN
 PRISONERS; R.B.; A.H.R.; S.L.; J.L.; J.M.;
 G.M.; A.S.; and L.T., individuals on behalf of
 themselves and all others similarly situated,

Plaintiffs,

v.

UNITED STATES OF AMERICA FEDERAL
 BUREAU OF PRISONS, a governmental entity;
 BUREAU OF PRISONS DIRECTOR COLETTE
 PETERS, in her official capacity; FCI DUBLIN
 WARDEN THAHESHA JUSINO, in her official
 capacity; OFFICER BELLHOUSE, in his
 individual capacity; OFFICER GACAD, in his
 individual capacity; OFFICER JONES, in his
 individual capacity; LIEUTENANT JONES, in
 her individual capacity; OFFICER LEWIS, in his
 individual capacity; OFFICER NUNLEY, in his
 individual capacity; OFFICER POOL, in his
 individual capacity; LIEUTENANT PUTNAM, in
 his individual capacity; OFFICER SERRANO, in
 his individual capacity; OFFICER SHIRLEY, in
 his individual capacity; OFFICER SMITH, in his
 individual capacity; and OFFICER VASQUEZ, in
 her individual capacity,

Defendants.

Case No. 3:23-cv-04155

**DECLARATION OF OREN
 NIMNI IN SUPPORT OF
 PLAINTIFFS' MOTIONS FOR
 PRELIMINARY INJUNCTION
 AND PROVISIONAL CLASS
 CERTIFICATION**

[4339196.1]

1 I, Oren Nimni, declare:

2 1. I am an attorney barred in the State of Massachusetts, a pro hac vie motion is
3 forthcoming before this Court. I am the Litigation Director of Rights Behind Bars
4 (“RBB”), a non-profit law office in Washington, D.C., and counsel of record for the
5 Plaintiffs and Proposed Class. I have personal knowledge of the facts set forth herein, and
6 if called as a witness I could competently so testify. I make this declaration in support of
7 Plaintiffs’ Motion for Provisional Class Certification.

8 2. As a Litigation Director at RBB, I direct the litigation docket of RBB and
9 represent clients on that docket. The organization’s docket is comprised almost entirely of
10 conditions of confinement matters in the federal district courts and courts of appeals.
11 Currently we represent individuals, classes, and organizations challenging conditions of
12 confinement in local jails, state prisons, federal prisons, and immigration detention centers
13 across the country.

14 3. Rights Behind Bars has unique expertise in prison litigation matters. I have
15 served as counsel for dozens of incarcerated individuals arguing complex doctrinal matters
16 of prison law. *See e.g. Durham v. Kelly* (21-3187) (3rd Cir.); *Cason v. Maryland DOC*
17 (21-6290) (4th Cir.); *Wise v. Maruka* (21-6816) (4th Cir.); *Richardson v. Clarke* (21-6507)
18 (4th Cir.) *Longworth v. Mansukhani* (21-7609) (4th Cir.); *Koon v. North Carolina* (21-
19 6616) (4th Cir.); *Pinkston v. Kuiper* (21-60320) (5th Cir.); *Class v. Davis* (21-20560) (5th
20 Cir.); *Douthit v. Collier* (20-20550) (5th Cir.); *Marlowe v. LeBlanc* (20-30738) (5th Cir.);
21 *Savage v. LeBlanc* (22-30125) (5th Cir.); *Taylor v. Collier* (22-20398) (5th Cir.); *Creech v.*
22 *Ohio DOC* (21-3722) (6th Cir.); *Fugate v. Erdos* (21-4025) (6th Cir.); *Larson v. Eppinger*
23 *et al* (22-4029) (6th Cir.); *Williamson v. Wheeler at al.* (22-4017) (6th Cir.); *Shaw v.*
24 *Kemper* (21-3265) (7th Cir.); *Torres v. Brookman* (22-2830) (7th Cir.); *Starr v. Bland* (21-
25 2476) (8th Cir.); *Morris v. California* (21-16059) (9th Cir.); *Briceno v. Williams* (21-
26 55624) (9th Cir.); *Chernetsky v. State of Nevada* (21-16540) (9th Cir.) ; *Pamplin v. Lucas*
27 (22-15284) (9th Cir.); *Seidner v. DeVries* (20-17403) (9th Cir.); *Marquez v. Rodriguez* (21-
28 55981) (9th Cir.); *Standard v. Dy* (21-35582) (9th Cir.); *Silva v. United States* (21-1008)

(10th Cir.); *Wheat v. Day*, (20-14142) (11th Cir.).

4. Rights Behind Bars also has expertise in litigating complex prison matters in the federal district courts, including cases involving issues of alleged guard assault and class action litigation. I have served as counsel in numerous such cases. *See e.g. Rivas v. Hodgson* (1:18-cv-11275-PBS) (D. Mass.); *Savino et al v. Souza* (1:20-cv-10617-WGY) (D. Mass.) (class action); *Pillco Morocho v. Bristol County Sheriff's Office* (1:22-cv-10652-WGY) (D. Mass.); *Juarez v. SoFi* (4:20-cv-03386-HSG) (N.D. Cal.) (class action); *Jones v. City of St. Louis* (4:21-cv-00600-HEA) (E.D. Mo.) (class action); *Tillman v. City of St. Louis* (4:21-cv-00299-RLW) (E.D. Mo.); *Garrett v. Virginia Department of Corrections* (3:20-cv-00986-JAG) (E.D. Va); *Johnson v. McCowan* (7:20-cv-00582-MFU-JCH) (W.D. Va); *Ahn v. GEO Group LLC* (1:22-cv-00586-JLT-CDB) (E.D. Cal); *Edwards v. Buffalo* (5:21-ct-03270-D) (E.D. N.C.); *Washington v. Massachusetts Department of Corrections* (1:23-cv-10063) (D. Mass).

5. I have also worked with people advocating for clients at FCI Dublin and with people incarcerated at FCI Dublin for approximately the past 2 years and am intimately familiar with the issues attendant to the facility.

6. I graduated from the Northeastern School of Law in 2014. I was admitted to the Massachusetts Bar in 2014 and am also a member of the bars of the Districts of Massachusetts, Colorado, and N.D. Illinois, and the First, Third, Fourth, Fifth, Sixth, Seventh, Eighth, Ninth, Tenth, and Eleventh Circuits, as well as the Supreme Court of the United States.

7. Since being retained to pursue this action, I have devoted substantial resources to this case. My colleagues at RBB and I are committed to the full and thorough preparation of this case and to acting in the best interests of the class, and are willing to take this case to trial. As an organization whose mission is to use the law to address systemic issues incarcerated individuals, RBB is committed to zealously pursuing this matter. To my knowledge, RBB has no conflicts of interest that would prevent the firm from providing zealous representation of the named plaintiffs and the class.

1 I declare under penalty of perjury under the laws of the State of California that the
2 foregoing is true and correct, and that this declaration is executed at Oakland California
3 this 15th day of August, 2023.



Oren Nimni
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Honorific: Mr.
Pronouns: He/Him/His